

TO: United States Bankruptcy Court
For the District of Maryland

Date: January 17, 2017

1100

2017 JAN 17 PM 3:44

In re: Manangan, Rona Cervantes
Case No. 11-3-374 DER

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MARYLAND
BALTIMORE

Response to Supplement Motion to (I) Rescind Settlement Agreement and order approving Settlement Agreement and (II) Permit trustee to proceed with sale of real property.

Your Honor,

This is a letter of response to the supplement motion to rescind that the trustee send us Jan. 12, 2017. I recently submitted my letter of response to the "Motion to rescind sale of property" last Jan. 13, 2017. In that letter I acknowledge my debt & respectfully ask the court for a payment plan for I cannot afford to pay the amount I owed as of this time.

In their "Supplement to motion to rescind" they set the new deadline date of Jan. 23, 2017 from the previous deadline of Dec. 1, 2017 from their Nov. 21, 2016 letter which the trustee said is a typo error. Attached is the original letter the trustee send Nov. 21, 2016.

Your Honor, to be honest I cannot give that amount (\$30,000) in a matter of just one week time.

I am just an ordinary worker, I have a family that rely on me. I just recently got a full time job for I was unemployed after I filed bankruptcy. (2)

It is very hard for us to sell the property that my father & mother (deceased) owns, my siblings doesn't want to sell the property and we have an 87 year old father, where will he live? It is not an easy decision to sell the property as that house is the only legacy of our deceased mother.

Your Honor, as I clearly states on my first response letter, I acknowledge my debt and intent to ^{pay} the debt. Please consider again my payment proposal of \$15,000 lumpsum payable to the trustee within 3 months or \$500 each month until money owed is paid. Thank you very much.

Hoping for your kind consideration on this matter.

Respectfully,
Rona Cervantes Manangan



ATTACHMENT LETTER OF
TRUSTEE NOV. 21, 2016

DLA Piper LLP (US)
The Marbury Building
6225 Smith Avenue
Baltimore, Maryland 21209-3600
www.dlapiper.com

Regan K. La Testa
regan.latesta@dlapiper.com
T 410.580.4809
F 410.580.3809

November 21, 2016

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED
AND FIRST CLASS MAIL

Adriano Manangan
1223 Chesaco Avenue
Baltimore, Maryland 21237

Randolph Manangan
1223 Chesaco Avenue
Baltimore, Maryland 21237

Riza Manangan
1223 Chesaco Avenue
Baltimore, Maryland 21237

*Re: In re: Rona Cervantes Manangan
Bankruptcy Case No. 11-33374-DER*

Dear Messrs Manangan and Ms. Manangan:

As you may be aware, Richard M. Kremen (the "Substitute Trustee") has been appointed as the substitute Chapter 7 Trustee in the above-referenced bankruptcy case. This office represents the Substitute Trustee. The Substitute Trustee has replaced Lori Simpson (the "Former Trustee") as trustee in the case and is charged with completing the settlement which was entered into by each of you with Ms. Simpson.

On May 22, 2015, the bankruptcy court entered an Order authorizing the Former Trustee to sell the real property located at 1223 Chesaco Avenue, Baltimore, Maryland 21237 (the "Real Property"). Subsequently, the Former Trustee agreed to resolve the sale of the Real Property. Pursuant to the agreement, you are to pay to the Bankruptcy Estate the sum of \$30,000.00 (the "Settlement Amount"). In addition, upon payment of the Settlement Amount, certain releases would be executed. Further, as part of the settlement, the Former Trustee agreed to not execute the Order to sell the Real Property.

On December 30, 2015, the bankruptcy court entered an Order approving the settlement (the "Settlement Order"). It is my understanding that attempts to refinance the mortgage on the Real Property have not been successful. Nevertheless, it has been nearly a year since the entry of the Settlement Order and the Bankruptcy Estate has yet to receive the Settlement Amount.

Upon being appointed as Chapter 7 Trustee in this case, the Substitute Trustee allowed additional time to pass for the payment of the Settlement Amount, in light of information provided to him by the Former Trustee. However, at this time, the Substitute Trustee must move



Adriano Manangan
Randolph Manangan
Riza Manangan
November 21, 2016
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forward with this case. As such, the Substitute Trustee has instructed me to advise you that the Settlement Amount must be paid to the Substitute Trustee no later than Thursday December 1, 2017. The Settlement Amount should be paid by bank check made payable to "Richard M. Kremen, Chapter 7 Trustee for the Bankruptcy Estate of Rona Cervantes Manangan". The payment should be delivered to my attention at the address above.

In the event that the Settlement Amount is not received by me by December 1, 2017, the Trustee intends to immediately file a motion seeking to rescind the settlement agreement and the Settlement Order and to proceed with the sale of the Real Property, in conjunction with the Order previously entered by the court.

Thank you for your attention to this matter.

Very truly yours,

Regan K. La Testa

cc: Richard M. Kremen, Trustee

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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND

In Re: **RONA CERVANTES
MANANGAN**

* Case Number: 11-33374-DER
* Chapter: 7

Debtor(s)

*

*

CERTIFICATE OF SERVICE

I hereby certify that on this 17 day of JANUARY, 2017,
a copy of RESPONSE to Supplement Motion to (I) Rescind Settlement Agreement and Order Approving Settlement Agreement
And (II) Permit trustee to proceed with sale of property

was mailed first class mail, postage prepaid to:

RICHARD M. KROMEN, TRUSTEE
REGAN K. LA TESTA, ESQUIRE
DLA PIPER LLP (US)
THE MARLBURY BUILDING
6225 SMITH AVENUE
BALTIMORE, MD. 21209

Ronan M. Cervantes
Signature of debtor

1-17-17
Date

Signature of co-debtor

Date